

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

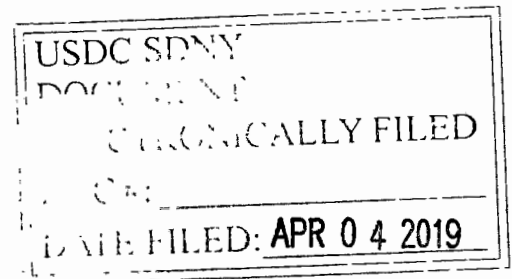
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:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
SAMUEL OLANIYI OLADIMEJI, :  
:  
:  
Defendant. :  
:  
- - - - - X

INDICTMENT

19 **19 CRIM 236**

COUNT ONE

(Wire Fraud)



The Grand Jury charges:

1. From at least in or about January 2019 up to and including at least in or about February 2019, in the Southern District of New York and elsewhere, SAMUEL OLANIYI OLADIMEJI, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, SAMUEL OLANIYI OLADIMEJI received wire transfers from a victim of a fraud scheme into a bank account controlled by OLADIMEJI and then withdrew or transferred said funds.

**Judge Hollerstein**

(Title 18, United States Code, Sections 1343 and 2.)

**FORFEITURE ALLEGATION**

2. As a result of committing the offense alleged in Count One of this Indictment, SAMUEL OLANIYI OLADIMEJI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(c) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes, or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



FOREPERSON



GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-338-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

SAMUEL OLANIYI OLADIMEJI,

Defendant.

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INDICTMENT

19 Cr.

(18 U.S.C. §§ 1343 and 2)


GEOFFREY S. BERMAN  
United States Attorney

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Foreperson

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- TRUE BILL & INDICTMENT  
- MAG ROBERT W. LEHRBROGER.

4/4/19 

"Wheel "A" - DJ-